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MEMO ENDORSED

August 8, 2024

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007
via ECF

Re: United States v. Manuel Perez,
23 Cr. 494 (VEC)

Your Honor:

I write to request an extension time to file Manuel Perez's sentence memorandum to Monday August 12, 2024. I mistakenly believed that the sentencing memos in this case were due a week prior to sentence, as is usually required by the Court. However, the memos were due yesterday, August 7, 2024, pursuant to the Court's, June 21, 2024 order. The government memo was filed yesterday and a link to the related exhibits was provided today. I regret that I have not adhered to the Court's previously ordered schedule.

Mr. Perez and I would prefer to proceed to sentence as scheduled on August 21, 2024, but I need the time requested to prepare his sentencing memo and obtain letters that he has already gathered in support of his sentencing. In the alternative, if the Court finds that a defense filing on August 12, 2024 would be untimely, I request an adjournment of Mr. Perez's sentencing to a date in September, 2024. I have not consulted with the Assistant William Kinder, Esq. on this application, but I do not believe he would consent to an adjournment, but instead, would likely take no position.

Respectfully,

Lisa Scolari

Lisa Scolari

Defendant Perez may file his sentencing submission by not later than
Monday, August 12, 2024.

SO ORDERED.

Valerie Caproni

8/8/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE